

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED

NOV 30 2015

Clerk, U.S. District Court
Texas Eastern

SHAHRAM SHAKOURI #1558021,

§

§

v.

§

CIVIL ACTION NO. 4:15cv447

§

DIRECTOR, TDCJ-CID.

§

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Shahram Shakouri, TDCJ-CID #1558021, Petitioner, pro se, and files this motion for an extension of thirty (30) days in which to file his response as to the timeliness of his writ of habeas corpus application in this Court. In support of this motion, Petitioner would respectfully show this Honorable Court the following:

I.

1. The Petitioner filed a petition for a writ of habeas corpus pursuant to Art. 11.07 T.C.C.P, by and through his attorney of record, the Honorable J. Jasuta, Attorney at Law. Petitioner knew he only had five (5) days from the time of the ruling in his state writ application to file his §2254 writ application. He presented his writ application, in what Petitioner believed to be a timely manner, on June 29, 2012.

2. Petitioner needs time to confer with his appellate counsel to determine what happened or why his writ application is being deemed filed late.

II.

3. For the foregoing facts Petitioner seeks this extension of time to present his position in this matter.

WHEREFORE, Petitioner prays this Court grant this motion and

extend the deadline for filing the response in Civil Action No.
4:15cv447 to December 26, 2015.

Respectfully submitted,

Shahram Shakouri

Shahram Shakouri #1558021
James A. Lynaugh Unit
1098 S. Highway 2037
Fort Stockton, Texas 79735

DECLARATION

I, Shahram Shakouri, TDCJ-CID #1558021, being presently incarcerated at the James A. Lynaugh Unit of TDCJ-CID, declare under penalty of perjury that the foregoing facts are true and correct.

Shahram Shakouri

Shahram Shakouri
Petitioner Pro Se